

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Basim Sabri, Marty Schulenberg, Mohamed
Cali, Jay Webb, and Zachary Metoyer,

Plaintiffs,

vs.

City of Minneapolis, a municipal corporation,
and the Whittier Alliance, a Minnesota
not-for-profit corporation,

Defendants.

Court File No. 15-CV-01578 (ADM/SER)

SUPPLEMENTAL

AFFIDAVIT OF ZACHARY

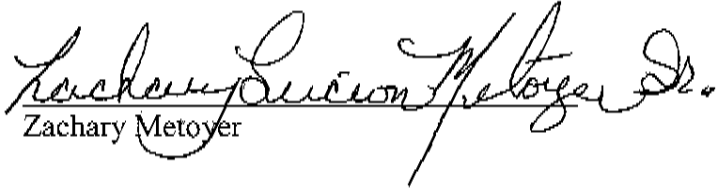
METOYER

STATE OF MINNESOTA)
)SS
COUNTY OF HENNEPIN).

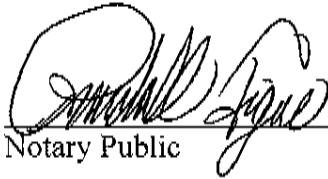
Zachary Metoyer, being first duly sworn, states and alleges as follows:

1. I am one of the Plaintiffs in the above-entitled matter.
2. In the several months before the March 2014 Whittier annual election I, along with Plaintiffs Mahamed Cali, Marty Schulenberg, and Jay Webb, and Roble Jama worked together to collect signatures from Somali-American businesses in Whittier neighborhood for the purpose of inclusion in the business directory of Whittier. True and correct copies of the signatures gathered from this collective effort are attached as Exhibit A to the Cali affidavit.
3. With respect to each page of signatures, we attached copies of either current business licenses, state sales tax number and/or federal 501(c)(3) status confirmation letter as well as a lease for each business.

4. The purpose of collecting this information and presenting it to Whittier was because we had numerous complaints from Somali-American businesses that they were unable to get included in the Whittier Alliance Business Directory, which would immediately grant them voting membership in the Whittier Alliance under its bylaws.
5. At Whittier Alliance meetings, many of the business owners I directly worked with complained and spoke up against board members and the executive director because of their disregard of the Somali business owners' rights to membership.
6. After I unsuccessfully presented a grievance protesting the exclusion of my fellow Plaintiffs from running for the Whittier Alliance Board of Directors, Defendant Whittier Alliance amended its bylaws to exclude from running for the Board of Directors anyone who has "committed an act of malice or defamation against Whittier Alliance or any member of its Board of Directors or otherwise disrupted the aims and purposes of the corporation."
7. I immediately recognized this provision as having been inserted for the sole purpose of preventing me, the other Plaintiffs, and people critical of the racist policies of the incumbent board and executive director from running.
8. Had it not been for this bylaw provision, I would have run for the Whittier Alliance Board of Directors in 2015. The addition of this provision to the bylaws convinced me that Whittier Alliance was being run as a dictatorship, rather than as a democracy.
9. I execute this affidavit in opposition to Defendants' motion to dismiss Plaintiffs' complaint and in support of Plaintiffs' motion for preliminary injunction.


Zachary Metoyer

Sworn to and subscribed before me
this 14 day of April, 2015.


Notary Public

